

**From:** Mike Willson **Ex. 6 - Personal Privacy**  
**Sent:** 12/5/2018 1:45:08 AM  
**To:** Krasnic, Toni [krasnic.toni@epa.gov]  
**Subject:** Re: Public inquiry - IPEN F3 position Paper and rebuttals  
**Attachments:** FFFC IPEN 2018 - POPRC comments on IPEN paper 18-3.pdf; Summary Corrections REVIEW - IPEN F3 Position Paper - POPRC-14, 14Nov18.pdf; FULL Corrections REVIEW - IPEN F3 Position Paper POPRC-14, FINAL- 14Nov18.pdf; IPEN\_F3\_Position\_Paper\_POPRC-14\_12September2018b.pdf

Thank you Toni,

Unfortunately I was unable to submit the additional information via the Docket link you provided, as there was no facility to add information or comment.

All boxes said "comments not accepted" or "comment period closed", and I could not find any way to upload the information.

Sorry to be a nuisance, but if you can guide me as to how to do this I will happily do so...

Meanwhile I am attaching the relevant documents for your information at least.

Best regards,

Mike.

On 5 Dec 2018, at 12:31 AM, Krasnic, Toni <[krasnic.toni@epa.gov](mailto:krasnic.toni@epa.gov)> wrote:

Dear Mr. Willson,

Thank you for your email dated November 25, 2018, regarding the IPEN F3 (Fluorine Free Foam) Position paper submitted to the UN Stockholm Convention POP Review Committee (POPRC).

EPA has not received the IPEN F3 paper directly. The United States is not a party to the Stockholm Convention on POPs, so had no formal role in the decision-making process. However, we do participate as an observer government in POPRC meetings and document reviews. We will keep in mind your concerns if and when this material may be considered within those venues.

You can submit the additional information you reference in your email to [Docket EPA-HQ-OPPT-2003-0012](#).

Additional information about EPA's activities on Per- and Polyfluoroalkyl Substances (PFAS) is available at <https://www.epa.gov/pfas>.

Sincerely,

Toni Krasnic  
Existing Chemicals Branch (ECB)  
EPA | Office of Pollution Prevention and Toxics (OPPT) | Chemical Control Division (CCD)  
Mail: 1200 Pennsylvania Avenue NW, MC-7405M | Washington, DC 20460  
Delivery: WJC East | 1201 Constitution Avenue NW, Room 4134D | Washington, DC 20004

-----Original Message-----

Subject: Form submission from: About EPA Contact the Office of Chemical Safety and Pollution Prevention form

Name: Mike Willson

Email: **Ex. 6 - Personal Privacy**

Comments:

Attn: Charlotte Bertrand and Nancy Beck,

I am writing to draw your attention to this disturbing IPEN F3 (Fluorine Free Foam) Position paper which seems to reject scientific evidence.

It was sent to the UN Stockholm Convention POP Review Committee at their Rome meeting in September. I suspect it may also have been sent to you - hence this e-mail - but it makes many misleading and incorrect statements without any substantiation, and rejects established scientific evidence confirming F3s are far from equivalent performance to fluorinated firefighting foam concentrates, ...and there are too many errors for it to be accidental.

18 of 19 supposed "Myths" are factually correct, with many claimed 'Reality' positions misleading or false. It is a worrying distortion of the facts... in the Fake News category.

The Fire Fighting Foam Coalition in US sent a strong rebuttal to the UN POP Review Committee (attached for reference), and I have also sent this summary and full review of corrections to the POP Review Committee for their consideration also. Hence I am sending this to you also, as it is important you can assess these misleading assertions in an informed way.

Please permit it to be shared with your relevant office staff, so they can determine whether they are being misled, from the evidence base and reference list supporting the points being made.

Foam users need to retain the use of more environmentally benign C6 short-chain foam concentrates as an accepted alternative to long-chain C8s, following your valuable EPA PFOA Stewardship program which supported the continued use of C6 firefighting foam agents and was much appreciated, alongside F3s which have a role to play in smaller less volatile fires, for firefighter training and system testing where most foam is actually used. But for emergency use in Major Hazard Facilities, including airports only legacy or C6 foams can currently deliver the necessary fast, effective, reliable and efficient fire control and extinguishment necessary to protect lives, reduce destruction of critical infrastructure which we rely on for socio-economic well-being of our communities and economies. I agree legacy foams containing PBT Substances like PFOS, PFHxS and PFOA - should be banned or very severely restricted, but C6 short-chain fluorotelomer foams behave very differently.

Yes they are still P, but not B and not T, with an average human half life of just 32 days, excreted through the urinary system, not a human half-life of 3-4 - 8.5 years as occurs with long-chain C8s like PFOA, PFOS and PFHxS. All firewater runoff and all firefighting foams present a pollution hazard.

I fear a repeat of the 1967 USS Forrestal disaster where 134 tragically died, 161 injured, 21 planes destroyed and 40 damaged on a US Aircraft carrier using a protein based F3, very similar to modern F3s, as neither has the necessary fuel shedding or vapour sealing characteristics critical to providing fast knockdown and control of major volatile fuel fires which saves lives and property and can reduce environmental impacts of the whole incident

- far less smoke, run-off, foam agent and water resources need to be used/produced. This is particularly important when foams are forcefully applied to deep seated volatile fuels!. Care is needed before winding that clock back as lives will again be exposed. Some can't adopt F3 fast enough... proven or unproven, placing lives in potentially unnecessarily increased danger!! It is important your eyes are open when dealing with these issues.

We have seen from the recent Footscray chemical factory fire in Melbourne, Australia a major environmental disaster ensued. It took F3s 16 hrs to gain control of the fire and over 5 days to extinguish all hot spots. 70million litres of contaminated water were pumped out of the creek to try and save it... 55million in first 3 days and 170m3 (tonnes) black sludge removed - but over 2,000 fish were still killed! Frederica Port in Denmark 2016 billed as an F3 "success" was one of the biggest environmental disasters Denmark has seen. This was also just a poorly combustible palm oil and liquid fertiliser fire... upon which water sprays could have been effective!

Also a Boeing 777 plane in Dubai 2016, burned for 16 hours under foam attack until the plane was destroyed! Miraculously all passengers and crew were evacuated before the fire took hold. tragically a brave firefighter died in a fuel tank explosion after 9 minutes. The final investigation report dealing with these firefighting failures has still not been released over 2 yrs after the event! All the indications are that F3 was used....details are in this FULL IPEN Review... with 145 references to support its corrections!

Three major F3 incidents since 2016 - all failures, seems more than coincidental!

Please provide an e-mail address or drop box where I can send the important supporting documentation to allow you to determine whether they are misleading, or not.

If you have any Qs please do not hesitate to contact me - I am an internationally know firefighting foam and foam systems specialist with over 30 years experience of developing, testing, comparing and reviewing environmental impacts of both Fluorinated and fluorine free foams. I am also a member to the Fire Protection Association Australia Technical Advisory Committee on Special Hazards, which includes firefighting foams and foam systems.

Thank you.

Best Regards,

Mike Willson,

Director and Technical Specialist - Fire Fighting Foams and Foam Systems.  
Willson Consulting, Tasmania, Australia.